CHIESA SHAHINIAN & GIANTOMASI PC

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Creditors Relief, LLC

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JEFFREY HALE, Individually and on Behalf of All Others Similarly Situated

Plaintiff,

VS.

CREDITORS RELIEF, LLC,

Defendant.

Civil Action No.: 2:17-cv-02447-JMV-MF

NOTICE OF MOTION FOR DISMISSAL AND/OR DENIAL OF CLASS CERTIFICATION

Motion Day: September 3, 2019

ORAL ARGUMENT REQUESTED

TO PLAINTIFF AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 3, 2019, or on such later date as the Court may order, Defendant Creditors Relief, LLC, through its undersigned counsel, shall apply to this Court pursuant to Federal Rule of Civil Procedure 23 for an order dismissing and/or denying certification of Plaintiff's proposed class.

PLEASE TAKE FURTHER NOTICE that Creditors Relief shall rely upon the accompanying Brief, Declaration of Alan Tunit, and Declaration of Lee Vartan, Esq.

PLEASE TAKE FURTHER NOTICE that a proposed order is submitted herewith.

Respectfully submitted,

CHIESA SHAHINIAN & GIANTOMASI PC

Dated: August 9, 2019

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